

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MASSACHUSETTS
(CENTRAL DIVISION)**

IN RE:

**SOUTHERN SKY AIR & TOURS, LLC
d/b/a DIRECT AIR,**

Debtor.

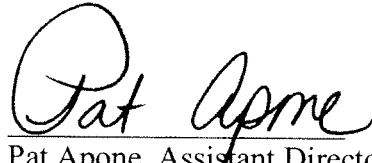
**Chapter 7
Case No. 12-40944-MSH**

**DECLARATION OF PAT APONE IN SUPPORT OF THE MOTION OF
HORRY COUNTY DEPARTMENT OF AIRPORTS TO DETERMINE
INAPPLICABILITY OF THE AUTOMATIC STAY OR, IN THE
ALTERNATIVE, FOR RELIEF FROM THE AUTOMATIC STAY**

I, Pat Apone, do hereby depose and state as follows:

1. I am the Assistant Director of Airports for Myrtle Beach International Airport, which is owned and operated by the Horry County Department of Airports (the “Department”), a department of Horry County (the “County”), and a political subdivision of the State of South Carolina.
2. In my capacity as Assistant Director of Airports, I am responsible for the day-to-day management and direction of Myrtle Beach International Airport.
3. I have read the Motion of Horry County Department of Airports to Determine Inapplicability of the Automatic Stay or, in the Alternative, for Relief from the Automatic Stay (the “Motion”) and its exhibits prior to signing this Affidavit. I have direct knowledge of the facts set forth in the Motion, which facts I either know to be true as a matter of personal knowledge or as a matter of the books and records of Myrtle Beach International Airport and the County maintained in the course of a regularly conducted business activity.
4. I reviewed the exhibits and affirm as true and correct copies of what the Motion describes them to be.

SIGNED UNDER THE PAIN AND PENALTIES OF PERJURY THIS 20TH DAY OF JUNE,
2012.

A handwritten signature in cursive script that reads "Pat Apone". The signature is written in black ink and is positioned above a horizontal line.

Pat Apone, Assistant Director of Airports
Myrtle Beach International Airport

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DECLARATION RE: ELECTRONIC FILING

PART I – DECLARATION

I, Pat Apone, hereby declare under penalty of perjury that all of the information contained in the Affidavit of Pat Apone In Support of the Motion of Horry County Department of Airports to Determine Inapplicability of the Automatic Stay or, in the Alternative, for Relief from the Automatic Stay ("Document"), filed electronically, is true and correct. I understand that this Declaration is to be filed with the Clerk of Court electronically concurrently with the electronic filing of the Document. I understand that failure to file this Declaration may cause the Document to be struck and any request contained or relying thereon to be denied, without further notice.

I further understand that pursuant to the Massachusetts Electronic Filing Local Rule (MEFR) 7(b) all paper documents containing original signatures executed under the penalties of perjury and filed electronically with the Court are the property of the bankruptcy estate and shall be maintained by the authorized CM/ECF Registered User for a period of five (5) years after the closing of this case.

Dated: June 20, 2012

Signed:


Pat Apone

PART II - DECLARATION OF ATTORNEY

I certify that the affiant signed this form before I submitted the Document, I gave the affiant a copy of the Document and this DECLARATION, and I have followed all other electronic filing requirements currently established by local rule and standing order. This DECLARATION is based on all information of which I have knowledge and my signature below constitutes my certification of the foregoing under Fed.R.Bankr.P. 9011. I have reviewed and will comply with the provisions of MEFR 7.

Dated: June 20, 2012

Signed: /s/ Lawrence M. Kraus
Lawrence M. Kraus BBO No. 564561